

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP  
A Limited Liability Partnership  
2 Including Professional Corporations  
ORI KATZ, Cal. Bar No. 209561  
3 okatz@sheppardmullin.com  
MICHAEL M. LAUTER, Cal. Bar No. 246048  
4 mlauter@sheppardmullin.com  
Four Embarcadero Center, 17<sup>th</sup> Floor  
5 San Francisco, California 94111-4109  
Telephone: 415.434.9100  
6 Facsimile: 415.434.3947

7 Counsel for Creditor, Citigroup Financial  
Products Inc.  
8

9 UNITED STATES BANKRUPTCY COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION  
12

13 In re:  
14 PG&E Corporation  
15 -and-  
16 Pacific Gas and Electric Company,  
17 Debtors

18 ☐ Affects PG&E Corporation  
19 ☒ Affects Pacific Gas and Electric  
20 Company  
☐ Affects Both Debtors

21 \* All papers shall be filed in the Lead  
22 Case, No. 19-30088  
23  
24  
25  
26  
27  
28

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF CONTINUED  
PERFECTION OF LIEN PURSUANT  
TO 11 U.S.C. § 546(b)(2)**

1 Citigroup Financial Products Inc. ("Citigroup"), as assignee of Campos EPC, LLC  
2 ("Campos"), by and through its undersigned counsel, hereby gives notice of continued  
3 perfection of its mechanics lien under 11 U.S.C. § 54(b)(2), as follows:

4 1. Campos is a counterparty to certain contracts, work orders, and related  
5 agreements (the "Agreements") for engineering design and construction work related to  
6 Pacific Gas and Electric Company's utility services in California. Pursuant to work  
7 performed by Campos pursuant to the Agreements, Campos is owed no less than  
8 \$787,397.39, plus applicable interest.

9 2. Pacific Gas and Electric Company (the "Debtor") filed a voluntary petition  
10 for relief under Chapter 11 of the Bankruptcy Code on January 29, 2019 (the "Petition  
11 Date").

12 3. Campos properly perfected its mechanics lien under California Civil Code §§  
13 8400, *et. seq.* by timely recording its Mechanics Lien (Claim of Lien) in the Official  
14 Records of the County of San Joaquin on March 27, 2019, as more fully described in its  
15 Mechanics Lien, a true copy of which attached hereto as **Exhibit A**.

16 4. Pursuant to California Code § 8460, an action to enforce a lien must be  
17 commenced within 90 days after recordation of the claim of lien. However, due to the  
18 automatic stay set forth in 11 U.S.C. § 362, Citigroup is precluded from filing a state court  
19 action to enforce the mechanics lien. Pursuant to 11 U.S.C. 546(b)(2), when applicable law  
20 requires seizure of property or commencement of an action to perfect, maintain, or  
21 continue the perfection of an interest in property, and the property has not been seized or  
22 an action has not been commenced before the bankruptcy petition date, then the claimant  
23 shall instead give notice within the time fixed by law for seizing the property or  
24 commencing an action.

25 5. Accordingly, Citigroup hereby provides notice of its right as a perfected lien  
26 holder pursuant to California's mechanics lien law.

27 6. This Notice shall not be construed as an admission that such filing is  
28 required or to the necessity of recording, commencement or seizure. Additionally,

1 Citigroup gives notice that it has, or may be entitled to, additional mechanics' liens rights  
2 to properties owned by the Debtor as they become due and owing according to prepetition  
3 contracts with the Debtor for improvements of real property. This Notice shall preserve  
4 and continue to preserved any and all of Citigroup's rights as to the Bankruptcy Code and  
5 the California Civil Code.

6 7. Citigroup expressly reserves its right to seek relief from the automatic stay to  
7 foreclose the mechanics lien and/or a waiver of any other rights or defenses. Citigroup  
8 further reserves the right to amend or supplement this notice.

9  
10 Dated: June 13, 2019

11 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

12  
13 By /s/ Michael Lauter

14 ORI KATZ  
15 MICHAEL LAUTER

16 Counsel for Citigroup Financial Products Inc.  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**EXHIBIT A**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Recording requested by (name):

M. Cory Richins

When recorded, mail to (name and address):

Cory Richins

1401 Blake Street

Denver, CO 80202

Doc #: 2019-030290

03/27/2019 12:06:36 PM

Page 1 of 5 Fee: \$117.00

Steve J. Bestolarides

San Joaquin County Recorder

Paid By: RELIABLE DOCUMENT RETRIEVAL

Recorder's Use Only

## CLAIM OF MECHANICS LIEN

(Cal. Civ. Code § 8416)

### Declaration of Exemption From Gov't Code § 27388.1 Fee

- ☐ Transfer is exempt from fee per GC § 27388.1(a)(2):  
☐ recorded concurrently "in connection with" transfer subject to DTT  
☐ recorded concurrently "in connection with" a transfer of residential dwelling to an owner-occupier  
☐ Transfer is exempt from fee per GC 27388.1(a)(1):  
☐ Fee cap of \$225.00 reached ☐ Not related to real property

1. Campos EPC, LLC, a Colorado limited liability company ("claimant") claims a mechanics lien for the labor or services or equipment or materials described in paragraph 2, furnished for a work of improvement on that certain real property located in the County of San Joaquin, State of California, and more particularly described as (address and/or sufficient description): McDonald Island District Natural Gas Storage Field Well Pads McD10 37°59'28.87"N 121°28'43.48"W, McD11 37°59'16.29"N 121°28'34.04"W, McD4 37°59'26.35"N 121°28'28.32"W, Zuck Henning 37°58'45.29"N 121°29'30.98"W, Zuck1 37°59'48.75"N 121°29'7.21"W, and Zack 3 37°59'48.75"N 121°29'7.21"W. See Attached Map

2. After deducting all just credits and offsets, the sum of \$787397.39, together with interest at the rate of 5.25% per annum from 4/22/2019 (date when balance became due), is due claimant for the following labor, materials, services, or equipment: See Attachment A

3. Claimant furnished the labor or services or equipment or materials, at the request of Pacific Gas and Electric Company. (employer, person, or entity to whom labor, materials, services, or equipment were furnished).

4. The name and address of the owner or reputed owner of the real property is/are: Pacific Gas and Electric Company, P.O. Box 997300, Sacramento, CA 95899-7300

5. Claimant's address is Campos EPC, LLC, 1401 Blake Street, Denver, CO 80202

Dated 3/8/2019

  
\_\_\_\_\_  
Campos EPC, LLC  
(Signature)

### VERIFICATION

I, M. Cory Richins, am the: partner of claimant on the foregoing claim of mechanics lien and am authorized to make this verification for and on its behalf. I have read the foregoing claim of mechanics lien and know the contents of the claim of mechanics lien to be true of my own knowledge.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated 3/8/2019



---

Campos EPC, LLC

(Signature)

## ATTACHMENT A

### DESCRIPTION OF WORK / SERVICES PERFORMED

Civil grading and construction services on multiple well pads

**Work Description per contract:** The Work described herein includes but is not limited to: Complete well pads filled and graded consistent with the construction documents to create expanded sites. Well pads planned for improvements are Zuckerman 1, Zuckerman 3, Zuckerman-Henning, MCD 4, MCD 10, and MCD 11. Additional well pads may be assigned to Contractor in 2019. In addition to construction, Contractor shall monitor and maintain Project safety; and perform Project management, quality assurance/control, Jobsite maintenance, preventative environmental protection, soil management, storm water management, Jobsite cleanup, and site restoration.



**NOTICE OF MECHANICS LIEN CLAIM  
ATTENTION!**

Upon the recording of the enclosed MECHANICS LIEN with the county recorder's office of the county where the property is located, your property is subject to the filing of a legal action seeking a court-ordered foreclosure sale of the real property on which the lien has been recorded. That legal action must be filed with the court no later than 90 days after the date the mechanics lien is recorded.

The party identified in the enclosed mechanics lien may have provided labor or materials for improvements to your property and may not have been paid for these items. You are receiving this notice because it is a required step in filing a mechanics lien foreclosure action against your property. The foreclosure action will seek to pay for unpaid labor, materials, or improvements provided to your property. This may affect your ability to borrow against, refinance, or sell the property until the mechanics lien is release.

BECAUSE THE LIEN AFFECTS YOUR PROPERTY, YOU MAY WISH TO SPEAK WITH YOUR CONTRACTOR IMMEDIATELY, OR CONTACT AN ATTORNEY, OR FOR MORE INFORMATION ON MECHANICS LIENS GO TO THE CONTRACTORS' STATE LICENSE BOARD WEB SITE AT [www.cslb.ca.gov](http://www.cslb.ca.gov).



**PROOF OF SERVICE AFFIDAVIT**  
**California Civil Code section 8416**

Failure to serve the Mechanic's Lien and Notice of Mechanic's Lien on the owner, or alternatively if the owner cannot be served on the lender or direct contractor, shall cause the Mechanic's Lien to be unenforceable as a matter of law (Civil Code Section 8024(d)). Service of the Mechanic's Lien and Notice of Mechanic's Lien must be by (1) registered mail, (2) certified mail, or (3) first-class mail evidenced by a certificate of mailing, postage prepaid, and to a residence or business address for the owner, lender or contractor. Further, a Proof of Service Affidavit (below) must be completed and signed by the person serving the Mechanic's Lien and Notice of Mechanic's Lien. This page should be completed (either one of the sections below) and recorded with the County Recorder along with the Mechanic's Lien and Notice of Mechanic's Lien.

**PROOF OF SERVICE AFFIDAVIT (ON OWNER)**  
**California Civil Code section 8416(a)(7) and (c)(1)**

I, M. Cory Richins (name), declare that I served a copy of this Mechanic's Lien and Notice of Mechanic's Lien by registered mail, certified mail, or first-class mail evidenced by a certificate of mailing, postage prepaid, addressed as follows to the owner(s) or reputed owner(s) of the property:

Company/Person Served: PG&E / Linda Y.H. Cheng

Title or capacity of person served (if appropriate): Registered Agent

Service address: 77 Beale Street, 24<sup>th</sup> floor, San Francisco CA 94105. Said service address is the owner's residence, place of business, or address showed by the building permit on file with the permitting authority for the work.

Executed on March 8, 2019 (date) at San Ramon (city), Costa County (county), California.

By: \_\_\_\_\_

Campos EPC, LLC

(Signature of person making service)

**ALTERNATE PROOF OF SERVICE AFFIDAVIT (ON LENDER OR DIRECT CONTRACTOR)**

**California Civil Code Section 8416(a)(7) and (c)(2)**

I, \_\_\_\_\_ (name), declare that the owner or reputed owner cannot be served with a copy of this Mechanic's Lien and Notice of Mechanic's Lien by registered mail, certified mail, or first-class mail. Pursuant to California civil Code section 8416(c)(2), I served a copy of this Mechanic's Lien and Notice of Mechanic's Lien by registered mail, certified mail, or first-class mail evidenced by a certificate of mailing, postage prepaid, addressed as follows to the construction lender or direct contractor as follows:

Company/Person Served: \_\_\_\_\_

Title or capacity of person served (if appropriate): \_\_\_\_\_

Service address: \_\_\_\_\_

Executed on \_\_\_\_\_, 20\_\_\_\_ (date) at \_\_\_\_\_ (city), \_\_\_\_\_ (county), California.

By: \_\_\_\_\_

(Signature of person making service)